

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

NOTICE OF MOTION

- against -

07 Cr. 1155 (RPP)

JAIME MENESES-MENA, et al.,

Defendant

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PLEASE TAKE NOTICE that Jaime Meneses-Mena, a defendant in the above captioned matter will move this Court pursuant to Rule 12 (b) of the Federal Rules of Criminal Procedure and the Fourth, Fifth, Sixth and Fourteenth Amendments to the United States Constitution, on September 22, 2008, upon the annexed declaration of Russell Neufeld and all prior pleadings and proceedings in this case, for the following Orders:

1. All discovery to which the Defendant is entitled pursuant to Rule 16 of the Federal Rules of Criminal Procedure;
2. Disclosure of all exculpatory materials pursuant to *Brady v. Maryland*, 373 U.S. 83 (1963) or to the impeachment of government witnesses pursuant to *Giglio v. United States*, 405 U.S. 150 (1972);
3. (A) Directing the Government to identify any recorded conversations which it proposes to offer into evidence at trial, together with transcripts in the original language of such recordings and translations of all portions not in English; (B) Scheduling a hearing to determine the audibility of such recordings and the accuracy of such translations; and (C) Granting leave to the defendant to file other and additional motions to preclude introduction of such recordings, transcripts and translations thereof;
4. Directing the Government to identify all confidential informants and to make them available to defense counsel to be interviewed;

And for such other and further relief as the Court may find just and reasonable.

Dated: September 3, 2008
New York, New York

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To: Courtesy copy to Court via regular mail
A.U.S.A Parvin Moyne via ECF and regular mail
All parties of record via ECF